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March 16, 2021

**Via CM/ECF**

The Honorable Ronnie Abrams  
United States District Court for the  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: ***United States v. Georgescu, Case No. 14-cr-00799-RA***

Dear Judge Abrams:

I write with regard to Virgil Flaviu Georgescu's March 2, 2021 *pro se* motion for compassionate release pursuant to 18 U.S.C. § 3582(c), in which he stated that he did not have an attorney and "request[ed] an attorney be appointed to help him." ECF No. 160 at 5. Your Honor previously appointed my firm to represent Mr. Georgescu in the above-captioned matter in June 2016 through the Court's Criminal Justice Act Panel. *See* ECF No. 91. We represented Mr. Georgescu on a *pro bono* basis in his post-conviction proceedings before Your Honor and through his appeal, and we are willing to continue representing Mr. Georgescu in this matter on the same *pro bono* basis.

While we have not contacted Mr. Georgescu, we anticipate that he will support our continued representation of him. In order to confirm that Mr. Georgescu consents to our representation, we respectfully request that the Court (a) adjourn the March 26, 2021 deadline for the Government's response to Mr. Georgescu's motion; and (b) provide us with two weeks to contact Mr. Georgescu and report back to the Court regarding his representation and the timing of a potential supplemental submission support of his motion.

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On March 16, 2021, we conferred with AUSA Ilan Graff, counsel to the Government, who did not object to this request.

Respectfully Submitted,



Steven M. Witzel

cc: Ilan Graff, Assistant United States Attorney (by ECF)

Application granted. By no later than March 31, 2021, Mr. Witzel shall update the Court on the status of his representation of Defendant. The Government's deadline to respond to Defendant's motion is hereby adjourned *sine die*.

SO ORDERED.



Hon. Ronnie Abrams  
March 18, 2021